

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BRYAN ANTHONY REO

Plaintiff,

v.

MARTIN LINDSTEDT

Defendant.

Case No: 1:21-cv-1809-WHB

Hon. Bridget M. Brennan

Mag. Judge William H. Baughman, Jr.

REO LAW, LLC

Bryan Anthony Reo (#0097470)

P.O. Box 5100

Mentor, OH 44061

(T): (216) 505-0811

(E): reo@reolaw.org

Pro se Plaintiff and Attorney

PLAINTIFF'S MOTION TO STRIKE
DEFENDANT'S MOTION FOR CHANGE OF VENUE

NOW COMES Bryan Anthony Reo ("Plaintiff"), *pro se*, and hereby propounds upon Defendant and this Honorable Court, Plaintiff's Motion to Strike Defendant's Motion for Change of Venue.

This motion is made pursuant to Fed. Rule. Civ. P. 12(f) on the basis that Defendant's Motion is not only frivolous in so much that it fails to articulate the actual facts that would support his assertion that the conduct did not occur or cause damage in Ohio, but the document itself is highly scandalous, vulgar, abusive, and offensive.

Defendant has filed a motion for a change of venue, seeking to have this case transferred to United States District Court for the Western District of Missouri. (ECF NO. 13)

Defendant's pleading jumps right into offensive abuse with a reference in the first sentence to Plaintiff as a "crazed delusional homosexual mongrel and state-sponsored agent provocateur and domestic lawfare terrorist." (ECF No. 13, PageID # 69)

Defendant's rants continue onto the next page with a diatribe aimed at the judiciary in general and Lake County Court of Common Pleas in particular, referring to a jury empaneled in 2019 as a "lynch mob jury" and presiding Judge Condon as "corrupt." (ECF No. 13, PageID # 70)

Apparently, Defendant's only basis for seeking this transfer is an order from 2014 wherein Judge Gwin transferred a case involving the same plaintiff and defendant from this instant action, to Missouri. However, at that time Plaintiff was not a licensed attorney, had not been through law school, and the complaint did not adequately address the issue of this court being proper venue or personal jurisdiction being exercised over the Defendant. Plaintiff would point to recent cases involving Martin Lindstedt (see 1:19-cv-02786-CAB, 1:19-cv-02589-CAB, 1:19-cv-02103-SO, and 1:19-cv-02615-JRA) all of which were litigated to conclusions on the merits in the United States District Court for the Northern District of Ohio.

Defendant's rant continues with threats to have "families put to the sword" with talk of "Gallows, the knife, and the rope." (ECF No. 13, PageID # 71)

Defendant ends with attaching his so-called “Initial Disclosures” which are themselves scandalous and offensive. The content of these “disclosures” speaks for itself, it need not be repeated here, nor will Plaintiff repeat it here even to quote it except to say that Defendant’s remarks about Plaintiff’s family are truly vile and despicable and warrant no further response.

Additionally, Plaintiff should not be required to construct Defendant’s legal argument for him and then argue against what Plaintiff is guessing might possibly be Defendant’s legal position. Plaintiff opposes the motion to change venue and will gladly brief the matter on the merits, and respectfully requests the opportunity to do so if this Court is not inclined to strike Defendant’s filing or if this Court otherwise so orders the briefing. Defendant’s filing should be stricken and Defendant should be given an appropriate length of time sufficient to properly brief the matter but not so long as to unduly delay the proceedings, within which to file a rule compliant conforming motion for change of venue which articulates the basis by which he seeks the relief, without offensive or outrageous insults and commentary. Plaintiff will respond on the merits and work with the Court to have the matter resolved on the merits, but Plaintiff considers that having to respond substantively to what Defendant has just submitted would be offensive to Plaintiff’s dignity, reputation, family honor, and it is offensive to judicial economy and the dignity of this Court.

Mr. Lindstedt is no stranger to sanctions for his inappropriate behavior. Mr. Lindstedt has recently threatened to kill the justices of the South Dakota State Supreme Court, in writing, and was adjudicated vexatious for his troubles. Mr. Lindstedt also stated that a South Dakota state trial court judge who signed an order to appoint a receiver had effectively “signed her own death

warrant.” (see attached Exhibit 1, Order from South Dakota Supreme Court adjudicating Martin Lindstedt a vexatious litigator)

Defendant really has no valid excuse or reason for why he persists with this level of disrespect when he has previously had filings stricken in United States District Court for the Northern District of Ohio especially in light of his recently being adjudicated vexatious in South Dakota.

Accordingly, Plaintiff respectfully moves that this Court enter an order striking, in its entirety, Defendant’s motion to change venue and the exhibits attached thereto, ECF No. 13, on the basis that said document is offensive and scandalous.

Respectfully submitted,

/s/ BRYAN ANTHONY REO

Bryan Anthony Reo

P.O. Box 5100

Mentor, OH 44061

(P): (440) 313-5893

(E): Reo@ReoLaw.org

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CERTIFICATE OF SERVICE

I, Bryan Anthony Reo, affirm that I am a party to the above-captioned civil action, and on May 11, 2022, I served a true and accurate copy the foregoing document upon Martin Lindstedt, 338 Rabbit Track Road, Granby, MO 64844, by placing the same in a First Class postage-prepaid, properly addressed, and sealed envelope and in the United States Mail located in City of Mentor, Lake County, State of Ohio.

Respectfully submitted,

/s/ BRYAN ANTHONY REO

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